

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

See paid \$25
E633907

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NANCY PASCAL, individually and
on behalf of a class, Plaintiff,

08 CV 0550 ()

- against -

MOTION TO ADMIT COUNSEL

ALLAN P. FEIGELSON, Defendant.
individually and d/b/a
ALLAN P. FEIGELSON, P.A., a dissolved
corporation, and BANK OF AMERICA, N.A.

PRO HAC VICE

FILED
U.S. DISTRICT COURT
2008 JAN 29 10:27
S.D. OF N.Y. W.P.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Abraham Kleinman, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Cathleen M. Combs
Firm Name: Edelman, Combs, Lattner & Goodwin, LLC
Address: 120 S. LaSalle Street, Suite 1800
City/State/Zip: Chicago, IL 60603
Phone Number: (312) 739-4200
Fax Number: (312) 419-0379

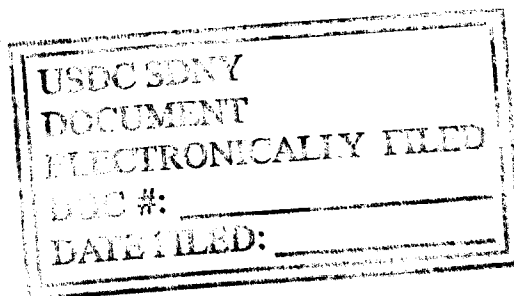
Cathleen M. Combs is a member in good standing of the Bar of the States of
Illinois

There are no pending disciplinary proceeding against Cathleen M. Combs
in any State or Federal court.

Dated: 1/24/2008
City, State: Uniondale, NY

Respectfully submitted,

[Signature]
Sponsor's *AK-6300*
SDNY Bar
Firm Name: KLEINMAN LLC
Address: 626 RexCorp Plaza
Uniondale, NY 11556
City/State/Zip: (516) 522-2621
Phone Number: (888) 522-1692 (fax)
Fax Number:



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X
NANCY PASCAL,
individually and on behalf of a class,

Plaintiff,

vs.

ALLAN P. FEIGELSON, individually
and doing business as ALLAN P.
FEIGELSON, P.A., a dissolved corporation,
and BANK OF AMERICA, N.A.,

Defendants.

-----X
NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that upon the affidavit of movant in support of this motion (attached hereto as Appendix 1) and the Certificate of Good Standing of Cathleen M. Combs (attached hereto as Appendix 2), we will move this Court before the Honorable Judge Robinson at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of applicant, a member of the firm of Edelman, Combs, Lattuner & Goodwin, LLC and a member in good standing of the Bar of the State of Illinois, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against applicant in any State or Federal court.

Dated: January 29, 2008.

Respectfully submitted,

**One of the attorneys for
Plaintiff Nancy Pascal**

A handwritten signature in black ink, appearing to read 'Abraham Kleinman', is written over a horizontal line.

Abraham Kleinman
KLEINMAN LLC
626 RexCorp Plaza
Uniondale, NY 11556-0626
(516) 522-2621
(888) 522-1692 (fax)
akleinman@solve360.com

APPENDIX 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X
NANCY PASCAL,
individually and on behalf of a class,

Plaintiff,

vs.

ALLAN P. FEIGELSON, individually
and doing business as ALLAN P.
FEIGELSON, P.A., a dissolved corporation,
and BANK OF AMERICA, N.A.,

Defendants.

-----X
style="text-align: center;">**AFFIDAVIT OF ABRAHAM KLEINMAN IN SUPPORT
OF MOTION FOR ADMISSION *PRO HAC VICE***

Abraham Kleinman, being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel at Kleinman LLC, Counsel for Plaintiff in the above captioned action. I am familiar with the proceedings of this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's Motion to Admit Cathleen M. Combs as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in November , 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Cathleen M. Combs since 1999.

4. Cathleen M. Combs is Of Counsel at Edelman, Combs, Lattuner & Goodwin,

LLC, in Chicago, Illinois.

5. I have found Cathleen M. Combs to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Cathleen M. Combs, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Cathleen M. Combs, *pro hac vice*, which is attached hereto as Exhibit A.

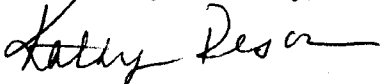
WHEREFORE it is respectfully requested that the motion to admit Cathleen M. Combs, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Further affiant sayeth naught.



Abraham Kleinman (AK-6300)
KLEINMAN LLC
626 RexCorp Plaza
Uniondale, NY 11556-0626
(516) 522-2621
(888) 522-1692 (fax)
akleinman@solve360.com

Subscribed and Sworn to me
this 29th day of January, 2008.



Notary Public

KATHRYN PESONEN
Notary Public, State of New York
No. 01PE8031028
Qualified in Nassau County
Commission Expires Sept. 27, 2009

APPENDIX 2

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Cathleen M. Combs

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Cathleen M. Combs
was duly admitted to practice in said Court on (12/09/1976)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (01/24/2008)

~~Michael W. Dobbins, Clerk,~~

By: Krysten J. Coppoletta
Deputy Clerk

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FOR THE SOUTHERN DISTRICT OF NEW YORK**

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NANCY PASCAL,
individually and on behalf of a class,

Plaintiff,

vs.

ALLAN P. FEIGELSON, individually
and doing business as ALLAN P.
FEIGELSON, P.A., a dissolved corporation,
and BANK OF AMERICA, N.A.,

Defendants.

-----X
[PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE*

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Cathleen M. Combs, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee within 10 business days.

This order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

SO ORDERED:

Honorable Judge Robinson

DATED: _____, 2008.